

Serial No. 09/865,458  
Amdt. Dated August 24, 2004  
Reply to Office Action of February 24, 2004

Docket No. LGE-0007

**REMARKS/ARGUMENTS**

Claims 1, 2, and 4-21 are pending in the application. By the Amendment, claims 1, 2, 4, and 7-21 are amended, and claim 3 is cancelled without prejudice or disclaimer of the subject matter therein. No new matter is added. Support for the claims can be found throughout the original specification, including the claims and the drawings originally filed. Thus, reconsideration in view of the above amendments and the following remarks is respectfully requested.

The Office Action objects to the Abstract for improper language and format. Applicants respectfully traverse the objection and submit that grounds for the objection are obviated by the above amendment to the Abstract. Withdrawal of the objection is thus respectfully requested.

The Office Action objects to claims 9, 11, 12, 17, and 20 for minor informalities. Applicants respectfully traverse the objection and submit that grounds for the objection are obviated by the above amendments to the claims. Withdrawal of the objection is thus respectfully requested.

The Office Action rejects claims 2, 3, 8, 13-15, 18, and 19 under 35 U.S.C. § 112, second paragraph, as indefinite. Applicants respectfully traverse the rejection and submit that grounds for the rejection are obviated by the above amendment to claims 2, 8, 13-15, 18, and 19. Withdrawal of the rejection is thus respectfully requested. Claim 3 is cancelled and the rejection thereof is therefore moot.

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The Office Action rejects claims 1-5 under 35 U.S.C. § 103(a) over U.S. Patent No. 6,581,207 to Sumita et al. (hereinafter “Sumita”) in view of U.S. Patent No. 6,044,365 to Cannon et al. (hereinafter “Cannon”). The Office Action appears to reject claims 6-21 also under 35 U.S.C. § 103(a) over Sumita in view of Cannon. Because the references, individually or in combination, fail to disclose or suggest all the features of the claims, the rejection is respectfully traversed.

With respect to claims 1-5, claim 1 is directed to an apparatus for mapping object data for matching user preference information and content description information, that includes features of a server (provider) system for transmitting an object data expression information table defining expression information about object data having various expressions of the same content, and information about multimedia program data to be serviced to a user, wherein the object data expression information table includes an identifier for expressing at least one first object data of the same content and at least one second object data different from the first object data. Applicants respectfully submit that at least such features are not disclosed or suggested by the references or their combination.

The Office Action, at page 4, asserts that Sumita describes a “broadcasting station” corresponding to a server system, which transmits an electronic program guide having information about multimedia program data to be serviced to a user. The Office action asserts that Sumita also describes an “information filtering unit” corresponding to a client system, which maps object data by receiving the content description information (i.e., the program guide)

which is then matched with user preference information extracted from user history information regarding prior multimedia programs. The Office Action acknowledges that Sumita fails to disclose that the server also transmits an object data expression information table which defines expression information about multimedia data having various expressions of the same content, and which is used to map the multimedia data having various expressions to user preference information. The Office Action nevertheless asserts that Cannon discloses a “thesaurus file” corresponding to an object data expression information table.

The Office Action concludes that it would have been obvious to one of ordinary skill in the art to modify the system disclosed in Sumita such that the information filtering unit additionally receives a thesaurus file as described in Cannon, for referencing programs in the electronic program guide by keyword. The proposed modification of Sumita by Cannon, the Office Action asserts, would have been advantageous because a thesaurus file provides for a more accurate determination of media, given a keyword. Applicants respectfully submit that the Office Action fails to establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a) for at least the following reasons.

Applicants respectfully submit that when establishing a *prima facie* case of obviousness, the Office carries the initial burden of establishing, *inter alia*, that some suggestion or motivation exists in either the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the teachings of the references. M.P.E.P. § 2143. In addition, the Office must show that the references when combined teach or suggest all of the

limitations of the claims. *Id.* In the instant case, the rejection is improper at least for the reason that Sumita and Cannon do not teach or suggest all of the elements of the claims.

The Federal Circuit has held that a clear and particular suggestion must exist in the prior art to combine the teachings of the cited references in the manner proposed by the Office. As explained by the Federal Circuit, “[o]ur case law makes clear that the best defense by the subtle but powerful attraction of a hindsight-based obviousness analysis is rigorous application of the requirement for a showing of the teaching or motivation to combine prior art references.” See *In re Dembiczak*, 175 F.3d 994, 999, 50 U.S.P.Q.2d 1614, 1617, (Fed. Cir. 1999). In the instant case, Applicants respectfully submit that a clear and particular suggestion or motivation to modify Sumita by Cannon as suggested in the Office Action is lacking. Thus, the rejection of claim 1 under § 103(a) is improper and should be withdrawn. Therefore, claim 1 defines patentable subject matter.

For at least the above reasons, Applicants respectfully submit that claim 1 is allowable. Claims 2, 4, and 5 depend from claim 1 and thus are allowable for at least the same reasons, as well as additional patentable features recited therein and the combinations thereof. Withdrawal of the rejection is thus respectfully requested. Claim 3 is cancelled and the rejection thereof is therefore moot.

Insofar as the Office Action rejects claims 6-21 over Sumita in view of Cannon, Applicants respectfully submit that at least for reasons similar to claim 1, claims 6-21 are allowable, as well as additional patentable features recited therein and the combinations thereof.

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For example, claim 15 is directed to a method for mapping object data for matching user preference information and content description information, in which storing the object data expression information table includes features of defining an identifier link by a UML method for identifying various object data as one object of the same content when one object data is variously expressed. Applicants respectfully submit that neither Sumita nor Cannon disclose or suggest at least such features. Withdrawal of the rejection of claims 6-21 is thus respectfully requested.

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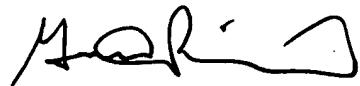
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### CONCLUSION

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney, Garth D. Richmond, at the telephone number listed below. Favorable consideration and prompt allowance are earnestly solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,  
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